

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETLIST, INC.,

Plaintiff,

vs.

MICRON TECHNOLOGY, INC.;  
MICRON SEMICONDUCTOR  
PRODUCTS, INC.; MICRON  
TECHNOLOGY TEXAS LLC,

Defendants.

Case No. 2:22-cv-294-JRG

JURY TRIAL DEMANDED

**JOINT MOTION TO EXTEND DEADLINES**

Plaintiff Netlist, Inc. (“Netlist”) and Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC (collectively “Micron”) file this joint motion and request that the Court extend the existing briefing deadlines for the following:

Event	Current Deadline	Proposed Deadline
Reply In Support of Defendants’ Renewed Motion for Judgment as a Matter of Law on Damages [Dkt. 156]	October 3, 2024	October 10, 2024
Reply In Support of Defendants’ Renewed Motion for Judgment as a Matter of Law of No Willfulness of the Asserted Patents [Dkt. 157]	October 3, 2024	October 10, 2024
Reply In Support of Defendants’ Rule 59 Motion for New Trial [Dkt. 158]	October 3, 2024	October 10, 2024
Reply In Support of Defendants’ Rule 50(B) Motion for Judgment as a Matter of Law for Non-Infringement Regarding U.S. Patent Nos. 7,619,912 and 11,093,417 [Dkt. 159]	October 3, 2024	October 10, 2024

Event	Current Deadline	Proposed Deadline
Sur-Reply to Defendants' Renewed Motion for Judgment as a Matter of Law on Damages [Dkt. 156]	October 17, 2024	October 30, 2024
Sur-Reply to Defendants' Renewed Motion for Judgment as a Matter of Law of No Willfulness of the Asserted Patents [Dkt. 157]	October 17, 2024	October 30, 2024
Sur-Reply to Defendants' Rule 59 Motion for New Trial [Dkt. 158]	October 17, 2024	October 30, 2024
Sur-Reply to Defendants' Rule 50(B) Motion for Judgment as a Matter of Law for Non-Infringement Regarding U.S. Patent Nos. 7,619,912 and 11,093,417 [Dkt. 159]	October 17, 2024	October 30, 2024

Good cause exists for the requested extension to allow the parties additional time to prepare meaningful briefing of the issues for the Court's consideration.

WHEREFORE, the parties respectfully request that the Court enter an order extending the deadlines as set forth in the table above.

Dated: September 27, 2024

Respectfully submitted,

By: /s/ Michael R. Rueckheim

Thomas M. Melsheimer  
 State Bar No. 13922550  
 TMelsheimer@winston.com  
 Natalie Arbaugh  
 State Bar No. 24033378  
 NArbaugh@winston.com  
 Rex Mann  
 State Bar No. 24075509  
 RMann@winston.com  
 Tracea L. Rice (*pro hac vice*)  
 WINSTON & STRAWN LLP  
 2121 N. Pearl Street, Suite 900  
 Dallas, TX 75201  
 Telephone: (214) 453-6500  
 Facsimile: (214) 453-6400

David P. Enzminger (*pro hac vice*)  
[denzminger@winston.com](mailto:denzminger@winston.com)  
WINSTON & STRAWN LLP  
333 South Grand Avenue, 38th Floor  
Los Angeles, CA 90071-1543  
Telephone: (213) 615-1700  
Facsimile: (213) 615-1750

Michael R. Rueckheim  
State Bar No. 24081129  
[MRueckheim@winston.com](mailto:MRueckheim@winston.com)  
Ryuk Park (*pro hac vice*)  
[RPark@winston.com](mailto:RPark@winston.com)  
Matthew R. McCullough  
[MRMcCullough@winston.com](mailto:MRMcCullough@winston.com)  
WINSTON & STRAWN LLP  
255 Shoreline Drive, Suite 520  
Redwood City, CA 94065  
Telephone: (650) 858-6500  
Facsimile: (650) 858-6559

Aldo A. Badini  
[abadini@winston.com](mailto:abadini@winston.com)  
WINSTON & STRAWN LLP  
200 Park Ave., Fl. 43  
New York, NY 10166-4193  
Telephone: (212) 294-4601  
Facsimile: (212) 294-4700

Brian J. Nisbet  
Maureen L. Rurka  
[bnisbet@winston.com](mailto:bnisbet@winston.com)  
[mrurka@winston.com](mailto:mrurka@winston.com)  
WINSTON & STRAWN LLP  
5 West Wacker Drive, Ste. 4200  
Chicago, IL 60601  
Telephone: (312) 558-5600  
Facsimile: (312) 558-5700

Matthew Hopkins (*pro hac vice*)  
State Bar No. 1500598  
[mhopkins@winston.com](mailto:mhopkins@winston.com)  
WINSTON & STRAWN LLP  
1901 L Street, NW  
Washington, DC 20036

Telephone: (202) 282-5000  
Facsimile: (202) 282-5100

William M. Logan  
State Bar No. 24106214  
wlogan@winston.com  
Juan C. Yaquian (*pro hac vice*)  
State Bar No. 24110559  
JYaqian@winston.com  
WINSTON & STRAWN LLP  
800 Capital Street, Suite 2400  
Houston, TX 77002  
Telephone: (713) 651-2600  
Facsimile: (713) 651-2700

**ATTORNEYS FOR DEFENDANTS  
MICRON TECHNOLOGY, INC.,  
MICRON SEMICONDUCTOR  
PRODUCTS, INC., AND MICRON  
TECHNOLOGY TEXAS LLC**

/s/ Andrew Strabone  
Jason G. Sheasby (pro hac vice)  
jsheasby@irell.com  
Annita Zhong, PhD (pro hac vice)  
hzhong@irell.com  
Andrew Strabone (pro hac vice)  
astrabone@irell.com  
Yanan Zhao (pro hac vice)  
yzhao@irell.com  
Michael W. Tezyan (pro hac vice)  
mtezyan@irell.com  
IRELL & MANELLA LLP  
1800 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
Telephone: (310) 277-1010  
Facsimile: (310) 203-7199

Samuel F. Baxter  
Texas State Bar No. 01938000  
sbaxter@mckoolsmith.com  
Jennifer L. Truelove  
Texas State Bar No. 24012906  
jtruelove@mckoolsmith.com  
MCKOOL SMITH, P.C.

104 East Houston Street Suite 300  
Marshall, TX 75670  
Telephone: (903) 923-9000  
Facsimile: (903) 923-9099

*Attorneys for Plaintiff Netlist, Inc.*

**CERTIFICATE OF SERVICE**

I certify that, on September 27, 2024, a copy of the foregoing was served on all counsel of record via the Court's ECF system.

*/s/ Michael R. Rueckheim*  
Michael R. Rueckheim

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rules CV-7(h) and (i), counsel for the parties met and conferred on the issues and all the parties join the motion.

*/s/ Michael R. Rueckheim*  
Michael R. Rueckheim